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September 9, 2022

BY ECF

Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Urooj Rahman, Case No. 20-CR-203

Dear Judge Cogan:

This letter concerns the sentencing memorandum and supporting materials for defendant Urooj Rahman. Sentencing is currently scheduled for September 29, 2022. By this letter, Ms. Rahman requests the Court's permission to file on the publicly available docket in this case a redacted version of her sentencing memorandum and supporting materials. Specifically, she seeks to redact:

- Names of minor children, pursuant to Federal Rule of Criminal Procedure 49.1(a);
- Addresses and contact information of third-party letter of support writers, pursuant to Federal Rule of Criminal Procedure 49.1(a)(5) and *U.S. v. Johnson*, 2018 WL 1611371, at *2 (E.D.N.Y. Apr. 3, 2018) ("the court does agree that the [w]riters have greater privacy concerns regarding their contact information. The court therefore grants Defendant's request to redact the Writers' contact information." (citation omitted)); and
- Medical and other sensitive personal information of third parties discussed in both the submission and the supporting materials, pursuant to *U.S. Amodeo*, 71 F.3d 1044, 1051 (2d Cir. 1995) ("the privacy interest of innocent third parties . . . should weigh heavily in a court's balancing equation"); *U.S. v Caicedo Velandia*, 2019 WL 6913524, at *3 (approving redactions of documents, including defendant's sentencing memorandum, that "implicate the privacy interests of [defendant] or third parties with no public ramifications.").

Honorable Brian M. Cogan

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We have discussed this approach for redactions with the Government, and they do not object. We thank the Court for its attention to this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Peter W. Baldwin". The signature is fluid and cursive, with a small dot at the end.

Peter W. Baldwin

cc: All Counsel of Record (via ECF)